

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW YORK
AND TOM HARFORD,

Defendants.

No. 1:18-cv-07831 (PAC)

Oral Argument Requested

DECLARATION OF ROBERTA A. KAPLAN

ROBERTA A. KAPLAN declares as follows:

1. I am a partner of the law firm of Kaplan Hecker & Fink LLP and am counsel for Defendant The Trustees of Columbia University in the City of New York ("Columbia") in this action.

2. I respectfully submit this declaration in support of Columbia's Motion for Sanctions Pursuant to Rule 11 of the Federal Rules of Civil Procedure.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Offer of Assignment and Occupancy Agreement between Plaintiff and Columbia University, signed by Plaintiff on July 20, 2018, with personal identifying information redacted.

4. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiff's Student Account Statement, dated November 16, 2018, with personal identifying information redacted.

5. Attached hereto as Exhibit 3 is a true and correct copy of an email from Ivonne Rojas, Acting Dean of Students for the School of General Studies, to Plaintiff, dated September 25, 2018, with personal identifying information redacted.

6. Attached hereto as Exhibit 4 is a true and correct copy of an excerpt of Columbia Residential's Policies, Terms & Conditions.

7. Attached hereto as Exhibit 5 is a true and correct copy of a screenshot of Plaintiff's Student Account from Columbia's Student Financial Services Department, accessed on January 30, 2019, with personal identifying information redacted.

8. Attached hereto as Exhibit 6 is a true and correct copy of a chain of emails between me and Plaintiff's counsel, Meredith Firetog, Esq., dated January 9–10, 2019, with information relating to certain confidential communications redacted.

9. Attached hereto as Exhibit 7 is a true and correct copy of a letter from me to Plaintiff's counsel, David W. Sanford, Esq., dated January 24, 2019, together with a copy of the enclosed proposed notice of motion.

10. Attached hereto as Exhibit 8 is a true and correct copy of an email from Plaintiff's counsel, David W. Sanford, Esq., to me, dated January 25, 2019.

11. Based on a reasonable inquiry, since the filing of this action, no steps have been taken to collect any amounts on Plaintiff's Columbia Student Account that remain unpaid.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed at: New York, New York
February 12, 2019



Roberta A. Kaplan